



PIER Program - Infrastructure Project Description Form

Version 1.3

Guidance documents and templates:

- [PIER Policy Manual](#)
- Project Schedule Template
- Budget Form
- All Recovery Assistance Received Table

Instructions for project leads completing the form for Selection Committee review:

- Please complete all **fields** except for the Project Selection questions. (If any other field is not applicable or cannot be completed, please explain why).
- The Selection Committee may request or require responses to additional questions or additional documentation.
- In several areas, **attachments** are requested. The editable Project Schedule Template and Budget Form are intended to help gather critical pieces of information. For the sake of clarity, you may wish to provide information in a different format, edit the templates, and/or provide supplemental information.
- In some cases, OHCS or the Selection Committee may need to follow up with questions.
- Application must be signed by an executive of the proposed project lead (e.g., city/county administrator or agency executive director).
- Forms should be submitted by email to the appropriate Selection Committee.
- Selection Committee's primary contact will forward any approved projects to OHCS for review.

Instructions for Selection Committees:

- Once a project has been selected by the Selection Committee, the Selection Committee's designated primary contact submits the completed Project Description Form. **Note: The selection committee must provide the answers to the Project Selection questions and attach relevant documentation.**
- Ensure that appropriate documentation of the required public hearing is attached. **Either:**
 - Record of a Public Hearing conducted by the project lead or
 - Record of a Public Hearing if that requirement was fulfilled by the Selection Committee.
- Please submit all documents via email to pier@hcs.oregon.gov; julie.lovrien@hcs.oregon.gov; and alex.j.campbell@hcs.oregon.gov.

Project Lead Information	
Project Title:	Mill City Water System Improvements - Pump Station
Project Lead Organization Name:	City of Mill City
Primary Contact Name and Title:	Stacie Cook, City Recorder
Phone Number:	503-897-2302
Email address:	scook@ci.mill-city.or.us
Mailing Address:	PO Box 256 Mill City, OR 97360
FEIN#:	93-6002210
UEI* #:	H7V4AHWGSLV5
<p>*The Unique Entity ID (UEI) is not required on this form. However, prior to execution of a grant agreement, a UEI is required. If you don't yet have a UEI, please begin the process to have one assigned ASAP, as it can take some time to receive one. On April 4, 2022, the UEI used across the federal government changed from the DUNS Number to the Unique Entity ID (generated by SAM.gov).</p> <ul style="list-style-type: none"> • The UEI is a 12-character alphanumeric ID assigned to an entity by SAM.gov. • Entity registration, searching, and data entry in SAM.gov now require use of the new UEI. • Existing registered entities can find their UEI by following instructions on the Federal Service Desk website. • New entities can get their UEI at SAM.gov and, if required, complete an entity registration. 	
Project Description	
<p>Select each county that your project benefits. Only counties eligible for CDBG-DR funds are listed below (check all that apply).</p>	
<div> <input type="checkbox"/> Clackamas <input type="checkbox"/> Jackson <input type="checkbox"/> Lane <input checked="" type="checkbox"/> Linn </div> <div> <input type="checkbox"/> Douglas <input type="checkbox"/> Klamath <input type="checkbox"/> Lincoln <input checked="" type="checkbox"/> Marion </div>	

Project Summary (answer the questions below)

1. Project purpose, area of benefit, and a description of the proposed activity:

Nineteen homes and one business adjacent to Hwy 22 in the NE section of Mill City were destroyed by the Beachie Creek wildfire. These structures were served by the city's water system, but the system did not have sufficient fire flows to fight the fire and protect the homes and businesses. Due to elevations, the existing water system can provide drinking water at 20 psi in compliance with health regulations, but no fire protection. There are no hydrants in this 10-block neighborhood. Most of the homeowners have rebuilt their homes since 2020, but they are still at risk from future wildfires coming down the steep slopes from the north.

The City has a developer interested in building a mixed-use development (housing and commercial) on a 3+-acre site north of Hwy 22. Water system improvements are required for the project to proceed. Adding fire flow capacity is the first phase of these improvements. The fire pump packaged pump station is needed first to be able to address the immediate fire flow capacity needs while also providing the capacity for the expanded upper zone. Subsequent phases would include the new development as well as larger diameter piping for better transmission in the distribution network.

The City proposes to install a packaged fire booster pump station with fire flow capacity, 1,050 feet of 8" water main, and 2 fire hydrants to serve the upper-level pressure zone within the NE section of Mill City. Keller Associates prepared a planning level cost estimate for the packaged fire booster station.

2. Project delivery summary (i.e., how the work will be done and those responsible for or involved in completing the project):

The City of Mill City will employ their City Engineer of Record, Keller & Associates, to design the project, prepare bid documents and run the bidding process, and then supervise a contractor selected through a qualified procurement process to complete construction of the project.

<p>3. State the project's anticipated outcomes and proposed performance measures. Describe the number and nature of the expected beneficiaries:</p>
<p>The project will provide necessary fire flow and fire hydrants for existing residents as well as for vacant properties that are available for residential/commercial development within the NE section of Mill City. Without improvements, vacant properties will not be able to develop due to the lack of fire protection, and current properties will be at increasing risk of fires.</p> <p>This increasing fire risk is not limited to the NE section of town, since a difficulty containing fire in one section of town puts other adjacent sections of town at increased fire risk as well. Therefore, the project's primary beneficiaries would be the residents of Mill City, which has a population of 1,760 residents according to the 2022 ACS 5-year estimates.</p>
<p>Unmet needs and alignment with state and local priorities:</p>
<p>1. State the unmet need(s) that will be addressed by the completion of this project:</p>
<p>The proposed project will aid in the revitalization of the fire damaged areas of Mill City by providing the necessary fire protection to ensure vacant properties have the ability to develop, and that rebuilt homes are safer from future fires. Both aspects – new growth and protection of current structures – are critically important for the recovery and long-term success of Mill City.</p>
<p>2. Describe how the activity will align with other planned federal, state, or local capital improvements and infrastructure development efforts, and/or other investments.</p>
<p>Other projects that directly support the revitalization of Mill City include replacing the City's aging sewer system, Marion County's Santiam Meadows housing development project, and Marion County's Wildfire Recovery Housing Program.</p>

3. Analyze the project's effects on Members of Protected Classes, HUD-identified Vulnerable Populations, and Historically Underserved Communities:

According to the most recent HUD data (2020), Mill City does not meet the threshold for 51% or more LMI area benefit. However, the percentage of LMI individuals is still high in this area, at 43.80%. Therefore, this project has a high proportional benefit to LMI individuals.

Furthermore, Mill City has a disproportionately high percentage of the population that identify as American Indian or Alaska Native. According to the 2022 ACS data, 9.7% of Mill City residents identify as American Indian or Alaska Native, which is nearly twice as high of a percentage as Marion County (5%) or Linn County (4.4%) as a whole. Therefore, this project disproportionately benefits this historically marginalized population.

Furthermore, with fewer than 2,000 residents, Mill City is a small town, which historically has made it difficult to fund infrastructure projects such as this project within the City. The installation of hydrant and water lines directly encourages the building of housing, since the lack of fire flow to the area inhibits property development, which will help the City grow long-term.

Cost Reasonableness and Justification:

1. Describe the cost evaluation process and describe how, if applicable, your project will employ adaptable and reliable technologies to prevent premature obsolescence of infrastructure:

Keller Associates reviewed several options for installation of a pump station to provide fire flows to this section of Mill City. Ultimately, a packaged fire pump system, which can be connected to the existing pump station and reservoir was found to be able to provide the necessary pressure and flows at a greatly reduced price from alternatives.

2. Explain the method used to determine project funding requirements. (Include qualifications of whoever completed the cost estimate.):
Keller Associates, professional engineers, produced a planning level cost estimate for the packaged fire booster station by reviewing several different options before ultimately recommending the most cost-effective option. Please note that the attached detailed cost estimate is for a slightly larger water improvement project than is being requested here, so the total projected cost on the estimate is above the total project budget.
Resiliency and Long-Term Recovery:
1. Does the project mitigate loss of life or property in the face of current and future natural hazards? If so, how?
Yes, the project mitigates loss of life or property in the face of current and future natural hazards by installing fire hydrants and water lines where none currently exist, that provide fire flow. In the event of a fire, firefighters will have access to water at pressurized rates, which is critical when suppressing fires and preventing / minimizing losses.
2. Describe any consultations or risk assessment that led to the selection of the project (for projects that are primarily mitigation-focused):
The risk assessment used that led to the selection of this project was the real-life loss of homes and property in the 2020 Beachie Creek Wildfire due to the lack of fire flow for fire suppression in the NE section of Mill City. The lack of sufficient flow during the 2020 fires made it devastatingly clear how dangerous the low flow levels are for the NE section of Mill City in particular.

3. Explain how the project will support restoration of infrastructure and related long-term recovery needs within historically underserved communities who have lacked adequate investments in housing, transportation, water, and wastewater infrastructure prior to the disaster:

The project represents an investment in water infrastructure, which is lacking in the NE quadrant of Mill City. Mill City is a small town with fewer than 2,000 residents, which historically has made it difficult to fund infrastructure projects within the City. The installation of hydrant and water lines directly encourages the building of housing, since the lack of fire flow to the area inhibits property development.

4. How will the project be designed and constructed to withstand chronic stresses and extreme disruptive events?

The project will be designed by professional engineers, using best practices for water line infrastructure construction.

5. Please list any and all procurement necessary for the project (professional services, technical design/engineering services, construction, etc.) Note that procurement follows 2 CFR 200. Refer to [Buying Right CDBG-DR and Procurement: A Guide to Recovery \(hudexchange.info\)](#).

Mill City will contract with a licensed professional engineering firm to design and bid the project and will use a combination of staff and professional engineers for project management and inspection services.

Construction will be completed by a contractor, selected via the competitive bidding process.

Maintenance and Operations:

Describe the future budget structures (including dedicated income streams) to fund maintenance and operation of the new asset. Include target operating reserves, anticipated insurance costs, and any other steps necessary to preserve useful function of the asset in case of future disaster:

Mill City has a maintenance budget for water service, which is funded through user rates and general fund dollars. The new infrastructure will be provided to the City's insurance carrier, CIS to add to our policy coverage.

National Objective
<p>All projects funded with CDBG-DR must meet the Low and Moderate Income (LMI) National Objective or the Urgent Need National Objective. OHCS will work with project leads to qualify projects for LMI, as feasible.</p>
<p>Low and Moderate Income (LMI) National Objective: Project or program has a limited clientele or a defined service area that is primarily residential, and at least 51% of the households within that service area are LMI.¹</p> <p>Please describe whether you believe the project is likely to be able to qualify under the LMI National Objective. Define the project or program service area, confirm the service area is primarily residential, and then determine if the service area is at least 51% LMI. LMI area benefit can be demonstrated through multiple methods, including use of map data/CSV spreadsheet described below or via survey. If planning to use a survey methodology, project leads should consult with OHCS first to ensure the process is methodologically sound.</p>
<p>Urgent Need: Project or program meets unmet needs that have a particular urgency, including addressing existing conditions that pose a serious and immediate threat to the health or welfare of the community. Project leads must also describe how the project responds to the disaster-related impact as described in the CDBG-DR impact and unmet needs assessment.</p> <p>Please describe, if an LMI national objective cannot be demonstrated, how the project will address an urgent need:</p>
<p>Mill City does not currently qualify for LMI designation since 43.80% of the population is LMI, which is below the 51% requirement.</p> <p>The proposed project will aid in the revitalization of the fire damaged areas of Mill City by providing fire flows that were unavailable during the 2020 Beachie Creek Wildfire. Installation of fire hydrants and water lines is imperative for providing the necessary fire flows to ensure adequate fire suppression to allow vacant properties to</p>

¹ Demonstrating LMI benefit

Demonstrate area benefit to low-and moderate-income persons by providing a CSV spreadsheet from HUDs LMISD website. Applicants are required to define the area that will benefit from the proposed project. The area must be located on HUD's LMI mapping application and the LMI income data must be submitted with this project description form.

Visit the HUD FY 2020 ACS 5-year 2011-2015 Low and Moderate-Income summary data page at <https://www.hudexchange.info/programs/acs-low-mod-summary-data/>. Follow the instructions detailed in the program guidelines to complete a CSV spreadsheet file (usually named "features.csv" when downloaded from the HUD website) that lists the census tracts and block groups located in the area of benefit. **If a .CSV file is not submitted, your form will be deemed incomplete. Please do not edit or alter the spreadsheet in anyway.** Attach the CSV file to the project description form.

develop, providing the potential for additional residential and commercial development within Mill City. Investment in critical infrastructure, especially a project that will directly support more housing, is critical for Mill City's continued recovery.

Furthermore, it is important to protect what has already been rebuilt. Most of the homeowners who lost their homes in the NE section of the city have rebuilt, but without adequate fire flows, homeowners who rebuilt are at risk of going through the same tragedy twice.

Project Selection & Citizen Participation

Public Hearing: Project leads are required to post or publish public notice and receive public input on the project. This can be done in coordination with the Selection Committee (prior to, subsequent to, or concurrent with) the Selection Committee's decision. It must be completed prior to OHCS review/approval of the Project Description Form.

At the public hearing, the following information should be covered. Each point must be reflected in the published public hearing minutes:

- The nature of the proposed activities.
- How the need for the proposed activities was identified.
- How the proposed activities will be funded and sources of funds.
- Requested amount of federal funds.
- Estimated portion of federal funds that will benefit persons of low- to moderate-income families (if applicable).
- Where the proposed activities will be conducted.
- Plans to minimize displacement of persons and businesses as a result of the funded activity.
- Plans to assist persons actually displaced (if applicable).
- Date the project form will be submitted to the selection committees.

Project description forms will not be complete and ready for OHCS review until these requirements are fulfilled.

Submit an attachment(s) verifying that public notice was provided and that the public hearing included all the above required elements and any public comments received.

To be completed after the public hearing is held.

Project Selection:
<p>1. Describe the process by which the Selection Committee came to the decision to select this project. Include any solicitation of projects, review or scoring of projects, or other activities that informed the decision. (May include processes that took place prior to establishment of the PIER program.)</p>
<p>To be added after Selection Committee reviews project.</p>
<p>2. Attach record of the Selection Committee decision (e.g., meeting notes). Include which members supported the project and how (in person voting or via written communication; attach any written approvals).</p>
<p>To be added after Selection Committee reviews project.</p>
Implementation Plan
<p>The state is required to expend all CDBG-DR assistance by Q1 2029. To ensure all projects are complete and meet the national objective by that expenditure deadline, all project leads must complete construction or activities and close out their projects in 2028 at the latest.</p>
<p>1. Provide a schedule for the entire grant period that organizes work into milestones and tasks. Please allow time for environmental reviews and permitting. You may use the provided Project Schedule Template, or you may attach your own schedule document.</p>
<ul style="list-style-type: none"> • Design project in 2025-2026 • Bid project in 2026 • Construct 2026-2027 • Close-out end 2027, beginning of 2028

2. **Provide an overview of the project management approach.** Include staff members and/or contractors to be selected that will be responsible for project management and any other relevant project delivery work. Include position descriptions for any additional staff that will be hired.

Mill City will contract with a project engineer to oversee design, permitting, environmental compliance and any needed right-of-way acquisition.

Construction will be completed by a contractor using the competitive bidding process. The project engineer and City staff will oversee construction and compliance.

3. **Describe the parties responsible for the ongoing maintenance and operations of the infrastructure.**

Mill City has a maintenance budget, which will be used to maintain the infrastructure.

Budget

CDBG-DR Infrastructure Program Project Budget Instructions

This template is customizable to fit the budget proposal for your project. Feel free to edit left-hand segments and add comments when needed. This is intended to be a high-level overview of uses and sources for the project. A detailed cost estimate is also required to be attached with this application.

If a section does not have enough cells for the category that you are working on, you can add cells by highlighting a complete row and right-clicking. A dialogue box will appear that permits you to add a row of cells. Click "Insert" and then select either "Insert Above" or "Insert Below," depending on where you would like the new row to be placed. The new row will appear above or below the row you highlighted. For example, if an activity has multiple non-CDBG sources, please add an additional row.

On the left-hand side of the template, there is a list of major project items. You may edit each of these areas to fit your proposed budget plan.

List project funding sources in the "Sources of Other Funds" category. Disclose the amount you requested or expect to receive. List the status of funding for all sources. Feel free to elaborate on other funds or funding plans in an attached narrative.

You can use the right-side comments column to elaborate on budgeted items as needed.

Ensure your budget is reasonable, appropriate, and accurate. Ensure all budgeted items are consistent with the project description and tasks. Ensure there is no Duplication of Benefits (DOB). All funds identified for use on your project must be fully disclosed and detailed to ensure budget accuracy and that DOB does not occur.

CDBG-DR PIER Infrastructure Program Project Budget						
Activity	CDBG-DR	Other non-CDBG-DR Funds	Source of Other Funds*	Total Funds (CDBG-DR and Other)	Status of Funding (secured, requested, committed)	Comments
Design/Planning	\$0	\$73,000	City funds	\$73,000	Requested	
Environmental Review	\$0	\$8,000	City funds	\$8,000	Requested	
Land Acquisition	\$0	\$10,000	City funds	\$10,000	Requested	
Permitting	\$0	\$2,500	City funds	\$2,500	Requested	
Construction	\$800,000	\$45,000	City funds	\$845,000	Requested	
Construction Management	\$0	\$41,500	City funds	\$41,500	Requested	
Program Activity Delivery (Ex: file management, reimbursement requests)	\$0	\$15,000	City funds	\$15,000	Requested	
Totals:	\$800,000	\$195,000		\$995,000		

* All funds identified for use on your project must be fully disclosed and detailed to ensure budget accuracy and no ^{DOB}. Show the sources and amounts of other funds needed to complete the project below, including local funds and grants from other agencies. Any anticipated or committed funds must also be included.

Complete the table below by listing all the funding assistance received to date for the system or systems included in the funding request. This is funding received in response to the 2020 Labor Day fires. (There is not a DOB if other funding sources are paying for an aspect or portion of the project that is not requested for CDBG-DR funding.)

All Recovery Assistance Received			
Source of Funding [Who is providing the assistance]	Amount of Assistance	Purpose of the Assistance [What costs are covered?]	Is there any duplication of benefits (DOB)?
FEMA Public Assistance	\$0	NA	<input type="checkbox"/> Yes <input type="checkbox"/> No
US Army Corp of Engineers*	\$0	NA	<input type="checkbox"/> Yes <input type="checkbox"/> No
FEMA Hazard Mitigation Grant Program	\$0	NA	<input type="checkbox"/> Yes <input type="checkbox"/> No
Hazard Insurance Proceeds	\$0	NA	<input type="checkbox"/> Yes <input type="checkbox"/> No
American Rescue Plan Act	\$0	NA	<input type="checkbox"/> Yes <input type="checkbox"/> No
State Funding	\$0	NA	<input type="checkbox"/> Yes <input type="checkbox"/> No
Other [fill in]			<input type="checkbox"/> Yes <input type="checkbox"/> No

Non-Supplanting of Funds Certification

Federal funds must be used to supplement existing funds for program activities and must not replace those funds that have been appropriated for the same purpose.

Supplanting shall be the subject of application review, post-award monitoring, and audit. If there is a potential presence of supplanting, the applicant or grantee will be required to supply documentation demonstrating that the reduction in non-Federal resources occurred for reasons other than the receipt or expected receipt of Federal funds.

We acknowledge and certify that any CDBG-DR funds awarded shall be used to supplement existing funds for program activities and will not replace (supplant) nonfederal funds that have been appropriated for the purposes and goals of the grant.

We acknowledge and understand that supplanting violations may result in a range of penalties, including but not limited to suspension of future funds under this program, suspension or debarment from federal grants, recoupment of monies provided under CDBG-DR, and civil and/or criminal penalties.

- ☐ Yes
☐ No

FEMA PA or U.S. Army Corps of Engineers Funding

Per the FR Notice (87 FR 31636): "To comply with the statutory requirement in the Appropriations Act, grantees shall not use CDBG-DR funds for activities reimbursable by or for which funds are made available by the Federal Emergency Management Agency (FEMA) or the U.S. Army Corps of Engineers (USACE). Grantees must verify whether FEMA or USACE funds are available prior to awarding CDBG-DR funds to specific activities or beneficiaries. Grantees may use CDBG-DR funds as the non-Federal match."

Please describe why the project was not eligible for FEMA PA or US. Army funding or why the project sponsor did not apply for such funding.

Explanation Statement:

Compliance

According to 87 FR 6364, February 3, 2022, the state shall make reviews and audits, including on-site reviews of any project leads, as may be necessary or appropriate to meet the requirements of Section 104(e)(2) of the HCDA, as amended, and as modified by the Consolidated Notice. In the case of noncompliance with these requirements, the state shall take such actions as may be appropriate to prevent a continuance of the deficiency, mitigate any adverse effects or consequences, and prevent a recurrence. The state shall establish remedies for noncompliance by any project leads, designated public agencies, or local governments.

Can you certify to comply with state and federal register regulations as outlined in 87 FR 6364?

- ☐ Yes
- ☐ No

Please be advised that by answering “no” to this question, your submission will not be considered eligible for the PIER program.

87 FR 6364, February 3, 2022, is published online at

<https://www.federalregister.gov/documents/2022/02/03/2022-02209/allocations-for-community-development-block-grant-disaster-recovery-and-implementation-of-the>.

Signature/Certification

On behalf of the project lead organization, I certify that staff, contractors, vendors, and community partners of our proposed project:

- Will comply with all HUD and Oregon requirements in the administration of the proposed CDBG-DR-funded activities;
- Will work in cooperation with OHCS or designated subrecipient under a grant agreement that provides the pathway for successful CDBG-DR program(s) and/or project(s) and;
- Will certify that all information submitted in this Project Description Form is true and accurate to the best of my knowledge.

Name and Title: _____

Signature: _____

Date Submitted: _____

Attachment checklist

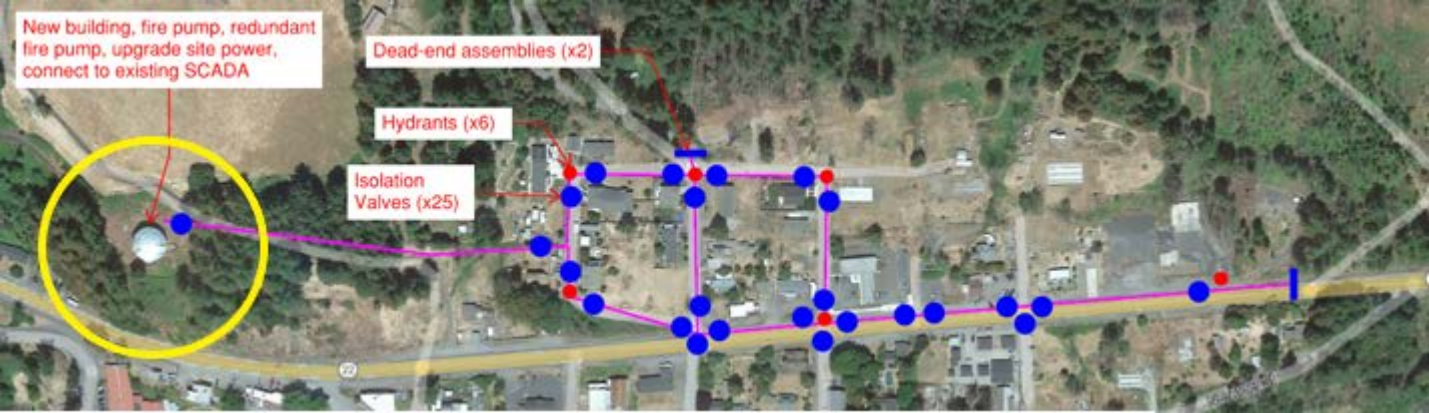
- ☐ National Objective Documentation
- ☐ Public Hearing & Notice Documentation
- ☐ Project Selection Record
- ☐ Citizen Participation Plan and Language Access Plan (or statement adopting state policy)
- ☐ Supporting documentation such as damage reports, economic studies, public documents that support or identify the project, etc.
- ☐ Latest Audited Financial Statement
- ☐ Detailed cost estimates that reflect contracted work and/or work conducted by internal staff
- ☐ Project Schedule

New building, fire pump, redundant fire pump, upgrade site power, connect to existing SCADA


Dead-end assemblies (x2)

Hydrants (x6)

Isolation Valves (x25)



DRAFT



245 Commercial St SE, Suite 210, Salem, Oregon 97:

Phone: 503.364.2002 - kellerassociates.com

Project: Funding Estimate - Water

Project #: KA 221267

Engineer: P.Olsen

Client: Mill City

Printed: Wednesday, May 22, 2024

ENGINEER'S OPINION OF MOST PROBABLE CONSTRUCTION COST

MILL CITY WATER SYSTEM IMPROVEMENTS (PUMP STATION)

CONSTRUCTION ITEM	QUANTITY	UNITS	UNIT PRICE	COST
Gravel Roadway Repair	600	LF	\$ 30	\$ 18,000
BOOSTER PUMP STATION				
Domestic & Fire Pump Station	1	LS	\$ 1,100,000	\$ 1,100,000
SUB-TOTAL				\$ 1,118,000
Mobilization and administration			10%	\$ 111,800
Bonding			2.5%	\$ 28,000
Prevailing wages			2.5%	\$ 28,000
American Iron and Steel (if federally funded)			5%	\$ 56,000
Project contingency			30%	\$ 335,400
CONSTRUCTION TOTAL				\$ 1,678,000
SOFT COSTS				
Permitting	1	LS	\$ 5,000	\$ 5,000
Design surveying (topo & ROW)	1	LS	\$ 5,000	\$ 5,000
Geotechnical investigation	1	LS	\$ 10,000	\$ 10,000
Environmental	1	LS	\$ 5,000	\$ 5,000
Legal, administration, and funding			2.5%	\$ 28,000
Design and bid phase engineering			12%	\$ 135,000
Construction contract adminstration			5%	\$ 56,000
Construction observation (Part-time for 6-months)			3.0%	\$ 34,000
SUB-TOTAL				\$ 280,000
Inflation	1	YR	5%	\$ 98,000
TOTAL COST ESTIMATE - BOOSTER STATION				\$ 2,056,000
AACE Class 5 High +100%				\$ 4,112,000
AACE Class 5 Low -50%				\$ 1,028,000

The opinion of most probable cost herein is based on our perception of current conditions at the project location. This estimate reflects our opinion of probable costs at this time and is subject to change as the project design matures. Keller Associates has no control over variances in the cost of labor, materials, equipment, services provided by others, contractor's methods of determining prices, competitive bidding or market conditions, practices or bidding strategies. Keller Associates cannot and does not warrant or guarantee that proposals, bids or actual construction costs will not vary from the costs presented herein. The costs herein are planning level, AACE Class 5, cost estimates for planning purposes only.